

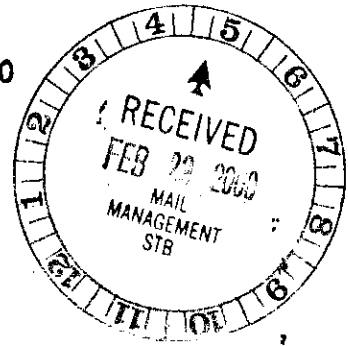
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# INTERNATIONAL RAW MATERIALS LTD

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19 February 2000



Mr. Vernon A. Williams, Secretary  
 Surface Transportation Board  
 Office of the Secretary  
 Case Control Unit  
 Attn: STB Ex Parte No. 582  
 1925 K Street, N.W.  
 Washington, D.C. 20423-0001

RECEIVED  
 Office of the Secretary

FEB 29 2000

Full of  
 the Board

Dear Sir:

Our company is a significant wholesale distributor of bulk fertilizers, and therefore is an extensive user of rail service in both the U. S. and Canada. We also operate a state of the art dry bulk export terminal in Longview, Washington and a liquids tank terminal in Portland, Oregon. The purpose of this letter is to comment on the issues to be discussed on March 8<sup>th</sup>, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, and their customers. The CN-BNSF combination should be judged on its own merits, and not the success or failure of their mergers either proposed or consummated. The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. As we only know too well, recent mergers have failed on service, not because of timing. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination will deliver service. Our service experience with both of these railroads has been very positive. There is therefore a high probability that a combination of the mutual interests of these two railroads will be beneficial to their customers, and it will certainly increase the flow of trade, both within North American, and to offshore markets.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process. Please do not let other railroads use the Surface Transportation Board process to protect themselves and not the shippers.

Sincerely,

*William P. O'Neill, Jr.*  
 W. P. O'Neill, Jr.  
 President

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